

# **Exhibit G**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

WE THE PATRIOTS USA, INC.;  
DIANE BONO;  
MICHELLE MELENDEZ;  
MICHELLE SYNAKOWSKI;  
*Plaintiffs,*

v.

KATHLEEN HOCHUL, GOVERNOR OF  
NEW YORK; HOWARD ZUCKER, M.D.,  
COMMISSIONER, NEW YORK DEP'T  
OF HEALTH,  
*Defendants.*

DOCKET NO.: 1:21-cv-04954

SEPTEMBER 9, 2021

AFFIDAVIT OF MICHELLE SYNAKOWSKI

MICHELLE SYNAKOWSKI swears or affirms, under penalty of perjury, the following:

1. I am an adult resident of the State of New York, residing in Syracuse;
2. I am a Registered Nurse, duly licensed to practice in the State of New York;
3. I am an employee of St. Joseph's Hospital, Syracuse, New York;
4. I am a committed and practicing member of the Roman Catholic Church;
5. I wholly subscribe to the teachings of the Catholic moral tradition as it pertains to the sanctity of all life, born and unborn, and, in particular, with respect to the intrinsic evil of abortion and all of its fruits.
6. I object to putting into my body any of the available COVID-19 vaccines which relied, in whole or in part, upon the use of fetal cell lines procured from electively aborted fetuses, for development, manufacturing or testing.
7. I will not comply with New York's regulation requiring all healthcare workers to be vaccinated for COVID-19 unless they have a medical exemption because it will violate my religious beliefs.
8. My employer has informed me that, if I choose to remain faithful to my conscience, it will rescind my current religious exemption from the COVID-19 vaccine and terminate my employment on September 21, 2021 because it is required to do so by New York State Health Regulation, Title 10, §2.61.

9. Not only will I be terminated from my current employment, but the new regulation bars me from obtaining other employment in my career field unless I receive the COVID-19 vaccination first.

Signed on 9/10/21 at Dewitt New York  
(DATE) (LOCATION)

NAME OF AFFIANT (PRINT): Michelle Synakowski

SIGNATURE OF AFFIANT: Michelle Synakowski

NOTARY PUBLIC (PRINT): Andres Sarmiento

SIGNATURE OF NOTARY PUBLIC: 

Andres Avelino Sarmiento  
01SA6256097  
Notary Public, State of New York  
Qualified in Onondaga County  
My commission expires FEBRUARY 21st, 2024